

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
1:25-cv-00391-CCE-LPA**

JOSHUA STOW, SHARONE BUNN,
AND TIARA LOFTON, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

ACTIVEHOURS, INC., d/b/a EARNIN,

Defendant.

**CONSENT MOTION FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Activehours, Inc. hereby moves for an extension of time, to and including July 17, 2025, within which to answer or otherwise respond to Plaintiffs' Class Action Complaint. (Doc. No. 1). In support of this motion, Defendant shows the Court the following:

1. Plaintiffs filed this action on May 19, 2025. (Doc No. 1).
2. On May 27, 2025, Defendant was served a copy of the complaint and summons. Therefore, the current deadline to serve an answer or other responsive pleading is June 17, 2025.
3. Counsel for Defendant need additional time to fully investigate this matter and to prepare a proper response. Counsel seek an extension, until and including July 17, 2025, to respond to Plaintiff's Class Action Complaint.

4. Counsel for Defendant contacted counsel for Plaintiffs regarding Plaintiffs' position on the relief sought by this motion. Counsel advised that Plaintiffs consent to the relief sought in this motion.

5. This motion is Defendant's first request for extension of time and is made in good faith and not for the purpose of unnecessary delay.

WHEREFORE, Defendant Activehours, Inc. respectfully requests an extension to July 17, 2025 to answer or otherwise respond to Plaintiffs' Class Action Complaint. A proposed order is submitted contemporaneously with this motion.

This the 16th day of June, 2025.

/s/ Stephen V. Carey
Stephen V. Carey
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Counsel for Defendant Activehours, Inc.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was electronically filed on this day with the Clerk of Court using the CM/ECF system which will automatically send notice of the same addressed to all counsel of record.

This the 16th day of June, 2025.

/s/ Stephen V. Carey
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